

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed June 7, 2005 ("Office Action"). At the time of the Office Action, Claims 1-48 and 51-59 were pending in the application (Claims 49 and 50 were withdrawn from consideration). In the Office Action, the Examiner rejects Claims 2-6, 20-22, 36, 37, 43-48 and 52-56. Applicants note with appreciation the statement by the Examiner that Claims 1, 7-19, 23-35 and 38-42 are allowed. Applicants amend Claims 1, 3, 19, 21, 35, 37, 43, 45, 51 and 53.

Drawings

The drawings are objected to under 37 CFR 1.83(a) for failure to illustrate the claimed dwell timer. The recited "dwell timer" corresponds to an amount of time, similar to a drop count and pick-up count, which may be tunable parameters in particular embodiments. *See, e.g.,* Specification, page 21, lines 26-32. In addition, the recited dwell timer is illustrated in connection with the flowchart of Figure 3. Applicants respectfully request withdrawal of the objection to the drawings.

Section 112 Rejections

The Examiner rejects Claims 43-48 under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement. Applicants have amended Claim 43 to recite "triggering a hand off of the call from the WLAN to the cellular network" which may, in some embodiments, be accomplished by software of the mobile station. Applicants thus respectfully submit that subject matter of Claims 43-48 is described in the Specification in such a way as to enable one skilled in the art to make and/or use the invention and thus respectfully request withdrawal of the rejection of these claims under the first paragraph of 35 U.S.C. 112.

The Examiner rejects Claims 2, 3, 4, 5, 6, 20, 21, 22, 36, 37, 44, 45, 52, 53, 54, 55, and 56 under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. As indicated above, the recited "dwell timer" corresponds to an amount of time, similar to a drop count and pick-up count. As recited in at least some claims and as included in the Specification and the Figures, expiration of this amount of time is keyed to particular

functionality. In addition, the value of this amount of time may comprise a tunable parameter as indicated in the Specification at page 21, lines 26-32 and, for example, Claim 6. Applicants thus respectfully submit that subject matter of Claims 2, 3, 4, 5, 6, 20, 21, 22, 36, 37, 44, 45, 52, 53, 54, 55, and 56 was described in such as away as to reasonable convey to one skilled in the relevant art that the inventors had possession of the claimed invention.

Allowable Subject Matter

Applicants note with appreciation the indication that Claims 1, 7-19, 23-35, 38-42, 51 and 57-59 are allowed. Applicants amended Claims 1, 3, 19, 21, 35, 37, 43, 45, 51 and 53 for clarification and respectfully request continued allowance of those claims.

CONCLUSION

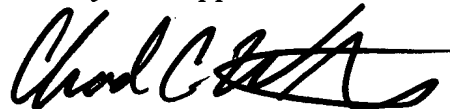
Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Chad C. Walters, Attorney for Applicants, at the Examiner's convenience at (214) 953-6511.

Although no fees are believed due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorneys for Applicants

A handwritten signature in black ink, appearing to read "Chad C. Walters", with a stylized flourish at the end.

Chad C. Walters
Reg. No. 48,022

Date: September 7, 2005

CORRESPONDENCE ADDRESS:

at Customer No.

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